

From: Basso, Candice
To: (b) (6)
Cc:
Bcc:
Subject: RE: some thoughts on the co-chairs statement
Attachments:

July 12, 2017 3:23:25 PM (-04)

Glad to be of help!

From: (b) (6)
Sent: Wednesday, July 12, 2017 3:21 PM
To: Basso, Candice <(b) (6)>
Cc: Hudak, Stephen (b) (6) >
Subject: Fwd: some thoughts on the co-chairs statement

Hi Candice,

Please see the email from the (b) (6), (b) (7)(D) . We all really appreciate your great comments!

Best regards,

(b) (6)

Sent via the Samsung GALAXY S® 5, an AT&T 4G LTE smartphone

----- Original message -----

From: (b) (6), (b) (7)(D)
Date: 7/12/17 1:21 PM (GMT-05:00)
To: (b) (6), (b) (7)(D)
(b) (6), (b) (7)(D)
Subject: RE: some thoughts on the co-chairs statement

Dear (b) (6)

Thank you very much for the comments.
They are very helpful.

RE: some thoughts on the co-chairs statement

Best,

Sorin

-----Original Message-----

From: (b) (6)

Sent: July-12-17 1:17 PM

To: (b) (6), (b) (7)(D)

Subject: Fwd: some thoughts on the co-chairs statement

Hi,

(b) (5), (b) (7)(E)

Best regards,

(b) (6)

Sent via the Samsung GALAXY S(r) 5, an AT&T 4G LTE smartphone

----- Original message -----

From: "Basso, Candice" (b) (6)

Date: 7/12/17 12:48 PM (GMT-05:00)

To: (b) (6)

Cc: "Hudak, Stephen" <(b) (6)>

Subject: some thoughts on the co-chairs statement

Hi (b) (6)

Attached are some thoughts-just my two cents. Sorry you had such an ordeal on your return! Welcome home!

Thanks,
Candice

From: Kiefel, Erik
To: Hudak, Stephen; Basso, Candice
Cc: Novis, Gary
Bcc:
Subject: Draft DPRK Advisory potentially for Monday am release
Attachments: [DPRK Financing Advisory \(v15\)+language.docx](#)

September 22, 2017 10:30:56 AM (-04)

Steve and Candice,

(b) (5)

Alex is working on the pretty version already.

(b) (5)

(b) (5)

Erik D. Kiefel

Senior Policy Advisor for Strategy

Policy Division

FinCEN

(b) (6)

(b) (6)

From: James, Sheri October 05, 2017 2:05:10 PM (-04)
To: El-Hindi, Jamal; Kirby, Jimmy; Taylor, Amy; Bergstrom, Peter; Ott, Timothy; Ott, Thomas; Brailey, Kip; Cox, Alan; Hudak, Stephen; Michael, Bess; Vannoy, Elizabeth (Betty); Basso, Candice; Ortiz, Elizabeth; Sharrin, Andrea; Gerardi, Robert; Martin, Becky; Porter, Kelly; Patel, Kristen; Rosenberg, Mike; (b) (6); Phelps, William (Charlie); Kuester, Jeremy; Anzaldua, Christina
Cc:
Bcc:
Subject: **Flash minutes: Wednesday, October 5, 2017**
Attachments: [10 5 17.docx](#)

Attached please find notes from the Flash meeting today. b(5)

b(5)

Thanks so much,

Betty and Sheri

From: Vannoy, Elizabeth (Betty)
To: Hudak, Stephen; Basso, Candice
Cc:
Bcc:
Subject: **FW: CLEARANCE REQUEST: Oct. 16, 2017 -- California Gaming Assn (Annual Mtg. & Trade Show).)**
(Lake Tahoe, NV)

Attachments: [Lake Tahoe CGA Annual Meeting Speech 10.02.17 LL edits.docx](#)

Hi Steve and Candice – Let me know if you are okay with the attached presentation that Delia Simona will give at the referenced event. The attached version includes some minor redline edits and comments that will be incorporated and addressed.

Thanks!

--Betty

From: Vannoy, Elizabeth (Betty)
To: Hudak, Stephen
Cc: Basso, Candice
Bcc:
Subject: RE: Presentation
Attachments: [FinCEN 101 - SSA Raymond ORZEL.PPTX](#) [SSA Orzel Talking Points - Capital One and IAFCI 07-17-17SDBRevisionsJul....docx](#)

July 13, 2017 9:15:34 AM (-04)

Just received the final versions as cleared by counsel. Thanks!

From: Vannoy, Elizabeth ("Betty")
Sent: Thursday, July 13, 2017 8:38 AM
To: Hudak, Stephen <(b) (6)>
Cc: Basso, Candice <(b) (6)>
Subject: Presentation

Hi Steve – Raymond Orzel is speaking next week at an event in McLean sponsored by Capital One and Mid-Atlantic International Association of Financial Crimes Investigators. (b)(5)

(b)(5)

(b) (5)

Thanks!

--Betty

From: Hudak, Stephen
To: Basso, Candice
Cc:
Bcc:
Subject: FW: Assessment Update
Attachments: [ASSESSMENT OF CIVIL MONEY PENALTY - updated 10.25.17v3_clean.docx](#)

Huh. Mornin'!

From: (b) (6)
Sent: Thursday, October 26, 2017 9:29 AM
To: Kirby, Jimmy (b) (6) >
Cc: Hudak, Stephen (b) (6) >; Orlin, Lindsay (b) (6) >; Ott, Thomas <(b) (6)>; El-Hindi, Jamal (b) (6) >
Subject: RE: Assessment Update

Hi Jimmy,

(b) (5)

Thank you,

(b) (6)

From: El-Hindi, Jamal
Sent: Thursday, October 26, 2017 9:11 AM
To: (b) (6) <(b) (6)>; Ott, Thomas <(b) (6)>
Cc: Hudak, Stephen <(b) (6)>; Kirby, Jimmy <(b) (6)>
Subject: Re: Assessment Update

(b) (5)

(b) (5)

(b) (5)

thanks for everything on this,

Jamal

Sent from Email+ secured by MobileIron

----- Original Message -----

From: (b) (6)

Date: Wed, Oct 25, 2017, 10:43 PM

To: "Ott, Thomas" (b) (6) "El-Hindi, Jamal" (b) (6) >

CC: (b) (6), (b) (6)

<(b) (6)>

Subject: RE: Assessment Update

Jamal,

(b) (5)

(b) (6)

From: Ott, Thomas

Sent: Wednesday, October 25, 2017 7:00 PM

To: (b) (6) >; El-Hindi, Jamal (b) (6) >

Cc: (b) (6) >; (b) (6)

(b) (6) >

Subject: RE: Assessment Update

Great work by the entire team – thank you! (b) (5)

(b) (5)

Jamal, we are happy to discuss. (b) (5)

Thanks again.

-- Tom

From: (b) (6)
Sent: Wednesday, October 25, 2017 2:05 PM
To: Ott, Thomas (b) (6); El-Hindi, Jamal (b) (6)
Cc: (b) (6); (b) (6)
<(b) (6)>
Subject: Assessment Update

Hi Tom and Jamal,

(b) (5)
(b) (5). A big thank you to (b) (6) for turning this around so quickly.

Thanks,

(b) (6)

(b) (6)

(b) (6) Office of Compliance and Enforcement

Enforcement Division

FinCEN

(b) (6)

From: Michael, Bess November 03, 2017 1:17:06 PM (-04)
To: El-Hindi, Jamal; Hudak, Stephen; Basso, Candice
Cc: Cox, Alan; Gerardi, Robert; Porter, Kelly
Bcc:
Subject: Fwd: FATF President Summary of Plenary Meeting
Attachments: [Draft Chairman's Summary Nov 2017.pdf](#)

Sent from Email+ secured by MobileIron

----- Original Message -----
From: "Kiefel, Erik" <(b) (6)>
Date: Fri, Nov 3, 2017, 1:58 PM
To: "Sharrin, Andrea" (b) (6) >, "Kuester, Jeremy" (b) (6) >, "Phelps, William (Charlie)" (b) (6) >, "Cohen, Jacob" (b) (6) >, "Elbashari, Ahmed" (b) (6) >, "Harris, Anthony" (b) (6) >, "Maesen, Betsy" (b) (6) >, "Stubbs, Matthew" (b) (6) >
(b) (6) >, "Middlebrooks, William" (b) (6) >
(b) (6) >, "Madinaveitia, Horacio" (b) (6) >
CC: "Michael, Bess" <(b) (6)>, "Novis, Gary" <(b) (6)>, "Bezek, Jill" (b) (6) >, "McManus, Kendal" (b) (6) >, "Melzer, Sharon" (b) (6) >, "Bestani, William" (b) (6) >, "Sinha, Anubhav" (b) (6) >, "Moye, Heather" (b) (6) >
Subject: FATF President Summary of Plenary Meeting

All,

(b) (5), (b) (7)(D)

(b) (5)

Erik

Sent from Email+ secured by MobileIron

----- Original Message -----

From: "Kiefel, Erik" <(b) (6)>
Date: Fri, Nov 3, 2017, 11:40 AM
To: "Sharrin, Andrea" <(b) (6)>, "Kuester, Jeremy" <(b) (6)>, "Phelps, William (Charlie)" <(b) (6)>, "Cohen, Jacob" <(b) (6)>, "Elbashari, Ahmed" <(b) (6)>, "Harris, Anthony" <(b) (6)>, "Maesen, Betsy" <(b) (6)>, "Stubbs, Matthew" <(b) (6)>
CC: "Michael, Bess" <(b) (6)>, "Novis, Gary" <(b) (6)>, "Bezek, Jill" <(b) (6)>, "McManus, Kendal" <(b) (6)>, "Melzer, Sharon" <(b) (6)>, "Bestani, William" <(b) (6)>, "Sinha, Anubhav" <(b) (6)>, "Moye, Heather" <(b) (6)>
Subject: Re: Co-chairs reports for RTMG and PDG plus Heads of FIU FATF Forum Readout Paper

All,

(b) (5), (b) (7)(D)

Sent from Email+ secured by MobileIron

Subject: Co-chairs reports for RTMG and PDG plus Heads of FIU FATF Forum Readout Paper

All,

(b) (5), (b) (6), (b) (7)(D)



Erik
Sent from Email+ secured by MobileIron

From: Melzer, Sharon
To: James, Sheri; Womack, Janet; Hudak, Stephen
Cc: Basso, Candice; Vannoy, Elizabeth (Betty)
Bcc:
Subject: RE: Folder for public Statements
Attachments:

November 21, 2017 2:35:23 PM (-05)

Hi Sheri,

Thank you for this information. Right now, I am just looking to see what is out there. (b) (5)

If it is on the webpage, then that's all I need to list. For right now, I just needed to know where the public statements were kept.

Thank you,

Sharon

From: James, Sheri
Sent: Tuesday, November 21, 2017 2:27 PM
To: Womack, Janet <(b) (6)>; Hudak, Stephen <(b) (6)>; Melzer, Sharon <(b) (6)>
Cc: Basso, Candice <(b) (6)>; Vannoy, Elizabeth ("Betty") <(b) (6)>
Subject: RE: Folder for public Statements

Hi Sharon - All our public statements and speeches are on the website so that it probably the best place to pull from. Instead of doing a search on the webpage, you can pull up the speech on the website (the PDF version) and then do a right click to select "find" and search whatever keywords you are looking for.

(b) (5)

Thanks,

Sheri

From: Womack, Janet
Sent: Tuesday, November 21, 2017 2:19 PM
To: Hudak, Stephen <(b) (6)>; James, Sheri <(b) (6)>
Cc: Basso, Candice <(b) (6)>; Vannoy, Elizabeth ("Betty") <(b) (6)>
Subject: FW: Folder for public Statements

All: Can anyone of you assist Policy Division on the request below? Sharon Melzer is a new FTE with the Office of Strategic Policy. She has been asked by her supervisor go through the public statements for examples/comments about TF.

I thought that maybe either one of you can help guide her in the right direction.

Appreciate your assistance!

Janet Womack


Program Administration Specialist

Policy Division

Financial Crimes Enforcement Network (FinCEN)

U.S. Department of the Treasury

(b) (6)

 (b) (6)

From: Melzer, Sharon
Sent: Tuesday, November 21, 2017 2:11 PM
To: Womack, Janet <(b) (6)>
Subject: Folder for public Statements

Hi Janet,

(b) (5)



Thank you,

Sharon


Sharon Melzer

Strategic Policy Specialist

Policy Division

Financial Crimes Enforcement Network (FinCEN)

U.S. Department of the Treasury
(b) (6)



 (b) (6)



From: Hudak, Stephen
To: Dash, Anthony; * Public Affairs
Cc: Gammon, Lynda; Phelps, William (Charlie)
Bcc:
Subject: RE: CNBC Request
Attachments:

January 11, 2018 10:51:24 AM (-05)

Thanks. (b) (5) At some point today I'll send her our statement.

From: Dash, Anthony
Sent: Thursday, January 11, 2018 10:46 AM
To: * Public Affairs <PublicAffairs@fincen.gov>
Cc: Gammon, Lynda <(b) (6)>; Phelps, William ("Charlie") <(b) (6)>
Subject: FW: CNBC Request

Good morning,

The FRC received the inquiry below. Being that this inquiry is from the media, I am forwarding it to Public Affairs, but I just want to be sure that I'm not leaving anyone out that needs to be made aware of these types of inquiries. I know that Steve is in the loop on the emails regarding FinCEN's position on the recent DOJ memo. Please let me know if anything else is needed on my end.

Regards,

Anthony Dash

Chief, Regulatory Support Section

U.S. Department of the Treasury

Financial Crimes Enforcement Network

Liaison Division, Regulatory Support Section

(b) (6)

(b) (6)

From: Rogers, Kate (NBCUniversal) [<mailto:Kate.Rogers@nbcuni.com>]
Sent: Thursday, January 11, 2018 10:20 AM
To: FRC <FRC@fincen.gov>
Subject: [EXTERNAL] CNBC Request

Hello- this is Kate Rogers from CNBC, I hope you're well. I wanted to see if you can comment and confirm this reporting from Reuters regarding AG Sessions' action on marijuana. Did FinCEN not have advanced warning about this action? And did you receive many inquiries regarding how to operate?

<https://www.reuters.com/article/usa-justice-marijuana/exclusive-u-s-justice-department-blindsided-banking-agency-on-pot-policy-flip-sources-idUSKBN1EZ2Y8>

Thank you!


Best,

Kate Rogers

Reporter

Phone: 201-735-b(6)

b(6)

 @katerogersnews



First in Business Worldwide

900 Sylvan Avenue | Englewood Cliffs, NJ 07632

From: Kiefel, Erik February 01, 2018 11:23:09 AM (-05)
To: Cox, Alan; Michael, Bess
Cc: Salley-Collins, Tywana (Contractor); Vannoy, Elizabeth (Betty); Kuester, Jeremy; Novis, Gary; Melzer, Sharon; Womack, Janet; Bezek, Jill; Hudak, Stephen; Basso, Candice; Lagasca, Jason; Gammon, Lynda
Bcc:
Subject: **For Director's Immediate Review and Approval: FinCEN FATF Advisory**
Attachments: [FinCEN FATF Advisoryv14_Final-2-01-2018.docx](#) [FATF Advisory Clearance Info \(XXX-2018\).docx](#)

Alan and Bess,

(b) (5)



Please let us know if you have any questions and when it has gone to the Director to review. Thanks so much.

Erik D. Kiefel

Senior Policy Advisor for Strategy

Policy Division

FinCEN

(b) (6)




From: James, Sheri November 30, 2016 3:14:43 PM (-05)
To: El-Hindi, Jamal; Kirby, Jimmy; Taylor, Amy; Brailey, Kip; Cox, Alan; Wade, Diane; Ott, Timothy; Gunderson, Jeannette; Hudak, Stephen; Michael, Bess; Vannoy, Elizabeth (Betty); Basso, Candice; Ortiz, Elizabeth; Ott, Thomas; Rosenberg, Mike; Sharrin, Andrea; Gerardi, Robert; (b) (6) Martin, Becky; Anzaldua, Christina; Porter, Kelly; Patel, Kristen
Cc:
Bcc:
Subject: **Flash minutes: Wednesday, November 30, 2016**
Attachments: [11_30_16.docx](#)

Attached please find notes from the Flash meeting today. b(5)

b(5)

Thank you,

Betty and Sheri

From: James, Sheri
To: Basso, Candice
Cc:
Bcc:
Subject: RE: Help!
Attachments:

January 04, 2017 1:47:42 PM (-05)

b(5), b(7)(D)

From: Basso, Candice
Sent: Wednesday, January 04, 2017 1:28 PM
To: James, Sheri (b) (6) >
Subject: RE: Help!

<https://www.treasury.gov/press-center/press-releases/Pages/jl1956.aspx>

From: James, Sheri
Sent: Wednesday, January 04, 2017 1:27 PM
To: Basso, Candice (b) (6) >
Subject: Help!

Ack! Do you have this news release by chance? Can't seem to pull it up on website. Need it ASAP if you have it. Thank you!!

<https://www.fincen.gov/news/news-releases/treasury-identifies-virtual-currency-provider-liberty-reserve-financial>

Here are some TPs that we used for the press call last July

From: Basso, Candice April 11, 2017 10:32:53 AM (-04)
To: Emery, James
Cc:
Bcc:
Subject: Here are some TPs that we used for the press call last July

Attachments: [Talking Points for Press Call - 7.25.16 to FO.docx](#)

From: Gammon, Lynda May 08, 2017 10:34:15 AM (-04)
To: Basso, Candice
Cc:
Bcc:
Subject: FW: 05-09 Event Memo on FinCEN Awards.docx
Attachments: [05-09 Event Memo on FinCEN Awards.docx](#)

From: El-Hindi, Jamal
Sent: Monday, May 08, 2017 10:14 AM
To: Hudak, Stephen <(b) (6)>; Gunderson, Jeannette
<(b) (6)>; * Associate Directors <AssociateDirectors@fincen.gov>
Cc: (b) (6); (b) (6); Gammon, Lynda <(b) (6)>
Subject: 05-09 Event Memo on FinCEN Awards.docx

Just an FYI...

All:

(b) (5)

Jamal

From: Hudak, Stephen
To: Basso, Candice
Cc:
Bcc:
Subject: FW: Real Estate GTO Talking Points
Attachments: [Talking Points for GTO Expiration Feb 2017 - LS.DOCX](#)

January 25, 2017 1:57:58 PM (-05)

Sorry, meant to include you...

From: Hudak, Stephen
Sent: Wednesday, January 25, 2017 1:56 PM
To: James, Sheri <(b) (6)>; Porter, Kelly <(b) (6)>; Sharrin, Andrea <(b) (6)>
Cc: Ott, Thomas <(b) (6)>; Scheinert, Lawrence <(b) (6)>; Kirschenbaum, Joshua <(b) (6)>; Gunderson, Jeannette <(b) (6)>
Subject: FW: Real Estate GTO Talking Points

(b) (5)

From: Scheinert, Lawrence
Sent: Wednesday, January 25, 2017 12:33 PM
To: Hudak, Stephen <(b) (6)>
Cc: Gunderson, Jeannette <(b) (6)>; Ott, Thomas <(b) (6)>; Kirschenbaum, Joshua <(b) (6)>
Subject: Real Estate GTO Talking Points

Hi Steve,

(b) (5)

Thanks,
Lawrence

Lawrence Scheinert
Director
Office of Special Measures
Financial Crimes Enforcement Network
U.S. Department of the Treasury
(b) (6)

From: James, Sheri May 15, 2017 2:29:09 PM (-04)
To: El-Hindi, Jamal; Kirby, Jimmy; Taylor, Amy; Brailey, Kip; Cox, Alan; Ott, Timothy; Gunderson, Jeannette; Hudak, Stephen; Michael, Bess; Vannoy, Elizabeth (Betty); Basso, Candice; Ortiz, Elizabeth; Ott, Thomas; Sharrin, Andrea; Gerardi, Robert; (b) (6); Martin, Becky; Anzaldua, Christina; Porter, Kelly; Patel, Kristen; Rosenberg, Mike; (b) (6)
Cc:
Bcc:
Subject: Flash minutes: Monday, May 15, 2017
Attachments: [5 15 17.docx](#)

Attached please find notes from the Flash meeting today. b(5)

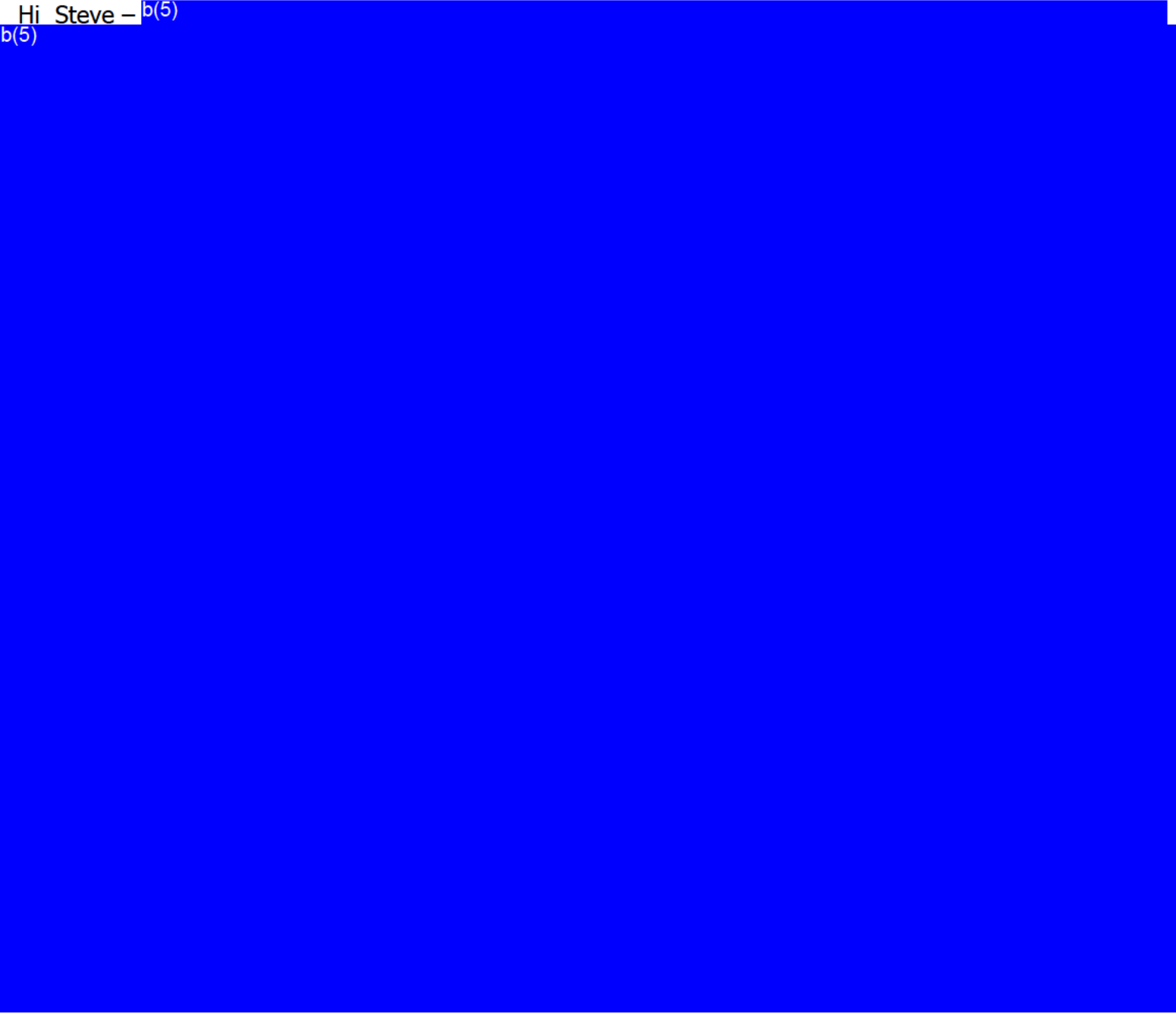
b(5)

Thank you,

Betty and Sheri

From: Vannoy, Elizabeth (Betty) June 09, 2017 6:54:26 AM (-04)
To: Hudak, Stephen
Cc: Basso, Candice
Bcc:
Subject: **CLEARANCE REQUEST: June 19, 2017--8th Parliamentary Security Forum**
Attachments: [Parliamentary Security Forum Talking Points - Hanson.docx](#) [B Draft Latvia Forum Agenda 5.24.17.pdf](#)

Hi Steve – b(5)
b(5)



From: Vannoy, Elizabeth (Betty)
To: Hudak, Stephen
Cc: Basso, Candice
Bcc:
Subject: FW: Invitation to speak at event at the UN in mid-July 2017
Attachments: [UN HLPF Talking Points.docx](#)

July 06, 2017 6:20:19 AM (-04)

Hi Steve –
b(5)

From: Orlin, Lindsay
Sent: Monday, July 03, 2017 1:32 PM
To: Cohen, Jacob (b) (6) >; Forbes, Theresa (b) (6) >; Vannoy, Elizabeth ("Betty ")
<(b) (6) >
Subject: FW: Invitation to speak at event at the UN in mid-July 2017

Counsel offers the following comments for the above event. Thanks.

(b) (5)

Lindsay

From: Vannoy, Elizabeth ("Betty ")
Sent: Monday, July 03, 2017 10:22 AM
To: Orlin, Lindsay <(b) (6) >
Subject: FW: Invitation to speak at event at the UN in mid-July 2017

Hi Lindsay – Will you please check on the status of the clearance on the attached TPs? They are due to Treasury today.
Thanks!

From: Vannoy, Elizabeth ("Betty ")
Sent: Tuesday, June 27, 2017 9:45 AM
To: Orlin, Lindsay <(b) (6)>
Subject: FW: Invitation to speak at event at the UN in mid-July 2017

Hi Lindsay – Will you please assign someone in counsel’s office to review Theresa’s talking points for her July 11 event? Thanks!

From: James, Sheri August 07, 2017 2:38:57 PM (-04)
To: El-Hindi, Jamal; Kirby, Jimmy; Taylor, Amy; Brailey, Kip; Cox, Alan; Ott, Timothy; Gunderson, Jeannette; Hudak, Stephen; Michael, Bess; Vannoy, Elizabeth (Betty); Basso, Candice; Ortiz, Elizabeth; Ott, Thomas; Sharrin, Andrea; Gerardi, Robert; Martin, Becky; Anzaldua, Christina; Porter, Kelly; Patel, Kristen; Rosenberg, Mike; (b) (6); Phelps, William (Charlie); Kuester, Jeremy
Cc:
Bcc:
Subject: Flash minutes: Monday, August 7, 2017
Attachments: [8 7 17.docx](#)

(b) (5)

Thank you,

Betty and Sheri

From: Forbes, Theresa August 02, 2017 9:19:10 PM (-04)
To: Hudak, Stephen; Basso, Candice
Cc: Cohen, Jacob
Bcc:
Subject: **Clearance to Share Public Speech**

Attachments: [UN HLPF Talking Points_Delivered.docx](#)

Hi Steve and Candice,

I've had several requests to share my speech at the UN on FinCEN efforts on human trafficking from USG interagency, NGOs and financial institutions. The speech was cleared by FinCEN FO and MT for public dissemination. The speech was recorded and is available online.

Can I share the speech as attached with USG, and private entities?

Thank you,

Theresa



**THERESA FORBES
INTERNATIONAL AFFAIRS ADVISOR
FINANCIAL CRIMES ENFORCEMENT NETWORK**

**UNITED NATIONS
HIGH-LEVEL POLITICAL FORUM
JULY 11, 2017**

Your excellences, honored delegates, distinguished guests—I am pleased to address this High-Level Political Forum on Sustainable Development.

Human trafficking is a transnational threat that harms every sector of our economy, our security, and our society. This session is a valuable opportunity to bring the financial components of the global threat of human trafficking to the forefront of international discourse.

The Financial Crimes Enforcement Network, or FinCEN, is proud to be here today to discuss the importance of 2030 Agenda for Sustainable Development and in particular Target 8.7 to take immediate and effective measures to eradicate forced labor, and end modern slavery and human trafficking. In order to effectively achieve this goal, the international community has been called on to develop and implement new and creative approaches to countering the financial operations of human trafficking networks.

As the Financial Intelligence Unit for the United States Government, and as the lead anti-money laundering watchdog for the federal government, FinCEN brings significant financial expertise to collecting and analyzing financial intelligence. FinCEN's motto is to "follow the money." This is done through disrupting the illicit proceeds of specified unlawful activities including the trafficking of persons. We use our data to identify human traffickers and their networks, to attack and

undermine the financial underpinnings of these networks, and to support law enforcement investigations that lead to accountability and justice.

I am pleased to share with you FinCEN's ongoing efforts to help end modern-day slavery, and I look forward to future collaboration through this forum. I will address FinCEN's efforts by using the fundamental international framework to combat human trafficking—the 4 P's—Prosecution, Protection, Prevention, and Partnership.

First, Prosecution.

Our anti-money laundering authority and data collection authority can provide a tactical and strategic advantage to law enforcement in human trafficking prosecutions. Information provided by financial institutions can help governments connect the dots between seemingly unrelated individuals or entities.

FinCEN, in collaboration with law enforcement agencies, non-governmental organizations, and members of the financial industry, identified financial indicators, or “red flags,” that may indicate financial activity related to human trafficking. In 2014, these “red flags” were circulated to tens of thousands of financial institutions through an advisory which provides guidance on how to detect and report suspicious financial activity with a potential nexus to human trafficking. Since 2015, FinCEN has received about 50 related suspicious activity reports per month by 100 distinct filing institutions.

This advisory helps inform FinCEN and law enforcement to identify suspected human trafficking activity.

For example, U.S. law enforcement can leverage financial data that FinCEN collects to investigate sex trafficking organizations that allegedly launder millions of dollars in illicit proceeds from the scheme.

- In one instance, members of the organization were making tens of millions of dollars by exploiting vulnerable women, often from impoverished backgrounds. The total number of women trafficked by the organization could reach the thousands.

- In other cases, massage parlor owners were convicted of conspiracy to commit money laundering for covering up the massage business as a front for sex slaves. Women were forced into sex labor, lived on premises and were not allowed to leave.
- The women were brought from other states and the funding for their travel was concealed in order to evade financial reporting requirements. Small amounts of cash were deposited at different banks to conceal the unlawful activity. The business used a cash only payment method and promoted the unlawful activity online.

Second, Protection.

The use of data FinCEN collects can help prosecutors identify victims and to locate, recover and return the proceeds of the crime back to the victim.

- Under federal law, traffickers are required to pay restitution to the victims. Seizing the proceeds of crimes can help restore victims to lives of independence and freedom.

Third, Prevention.

Following the money enables the dismantling of networks to a point where they aren't able to reorganize, preventing future victims from being exploited or re-exploited in situations where victims are particularly vulnerable.

Final, Partnership.

FinCEN partners with our international and domestic stakeholders in the fight against human trafficking. These collective efforts are key to solving the complex global challenge of eradicating human trafficking. I would like to now discuss a few examples of our work.

- The Egmont Group of Financial Intelligence Units is uniquely positioned to connect over 150 FIU networks

including those with representatives here today. This ability to securely share information via the Egmont Group, places FinCEN, and member FIUs in a critical position to help identify and disrupt human trafficking networks.

- FinCEN is aiding the Department of Homeland Security's Blue Campaign upcoming training for the financial sector on identifying human trafficking.
- In the past FinCEN has used its statutory authority to share information with financial institutions on networks and persons of concern. In addition, FinCEN encourages financial institutions to share information with one another while providing a statutory safe harbor.
- Since 2016, the U.S. Department of Treasury has been a member of the Presidential Interagency Task Force to Combat the Trafficking of Persons and utilizes this forum to engage with domestic partners and hear from human trafficking survivors on the advisory council to incorporate victim's voices.
- FinCEN also continues to receive feedback from our partners in law enforcement, financial institutions, and NGOs on new trends in financial activity linked to potential human trafficking.

Conclusion

We are fortunate to have a variety of tools at our disposal to make a real impact in the global fight against human trafficking – yet the most effective tool we have is each other. I appreciate having the opportunity to speak here today and we at FinCEN look forward to working with our stakeholders and international partners in combatting the illicit proceeds of these crimes.

From: Basso, Candice
To: Vannoy, Elizabeth (Betty)
Cc: Hudak, Stephen
Bcc:
Subject: RE: NAFCU 2017 talking points
Attachments: [NAFCU 2017.docx](#)

August 30, 2017 11:28:27 AM (-04)

Hi Betty,

No issues here!

Thanks,

Candice

From: Vannoy, Elizabeth ("Betty")
Sent: Wednesday, August 30, 2017 10:20 AM
To: Orlin, Lindsay (b) (6) >; Basso, Candice <(b) (6) >
Cc: Basso, Candice <(b) (6) >
Subject: FW: NAFCU 2017 talking points

Hi Lindsay and Candice – I need counsel's and PA's clearance on the attached talking points for Jamal to use when he speaks at the NAFCU 2017 Congressional Caucus on September 11. The talking points were pulled from previously cleared documents on FinCEN's public website (August 22 Advisory, GTO news release, and the LE awards program news release).

Thanks so much.

--Betty

From: Vannoy, Elizabeth (Betty)
To: Basso, Candice
Cc: Hudak, Stephen
Bcc:
Subject: **FW: Arizona Presentation Talking Points**
Attachments: [Arizona BEC Presentation 08182017 COUNSEL COMMENTS 8-30-17.docx](#)

August 31, 2017 6:49:47 AM (-04)

Hi Candice – The attached has been reviewed by counsel and reflects some edits that are being addressed. Any issues from PA standpoint?

Thanks!

From: James, Sheri
To: Hudak, Stephen; Basso, Candice
Cc:
Bcc:
Subject: RE: Expansion of GTO authority
Attachments:

September 06, 2017 10:43:38 AM (-04)

I have this but wasn't sure if there was more:

(b) (5)

From: James, Sheri
Sent: Wednesday, September 06, 2017 10:42 AM
To: Hudak, Stephen (b) (6) >; Basso, Candice <(b) (6) >
Subject: Expansion of GTO authority

Do you guys have any talking points on this issue or a summary of what the expansion does? Thank you so much!

From: Vannoy, Elizabeth (Betty)
To: Hudak, Stephen; Basso, Candice
Cc:
Bcc:
Subject: FW: Bipartisan Forum -- Reg Reform talking points
Attachments: [Bipartisan_RegReform_PD_ED_edits.docx](#)

September 06, 2017 3:40:16 PM (-04)

Counsel cleared these TPs. Can I note that PA has cleared? Thanks!

From: Vannoy, Elizabeth ("Betty")
Sent: Wednesday, September 06, 2017 11:41 AM
To: Orlin, Lindsay (b) (6)
Cc: Basso, Candice <(b) (6)>; Hudak, Stephen (b) (6) >
Subject: FW: Bipartisan Forum -- Reg Reform talking points

Hi Lindsay – Don't shoot the messenger. Can you please task out the attached talking points for counsel clearance? We need to get them to Treasury no later than COB tomorrow, but they should not be a heavy lift. The event is a panel discussion and the TPs will guide Jamal's input to the discussion. (b) (5)

PD and ED also added some text.

I am copying Candice and Steve to confirm PA clears as well.

Thanks so much.

Betty

From: Vannoy, Elizabeth (Betty)
To: Hudak, Stephen
Cc: Basso, Candice
Bcc:
Subject: **FW: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)**
Attachments: [20170710 Building a Culture of Compliance.pptx](#)

July 13, 2017 10:49:52 AM (-04)

Hi Steve – The attached TPs are with our counsel for review. I hoping to get them back today so I can send them to Treasury, but need your okay as well. Thanks!

From: Badal, Rollin
Sent: Tuesday, July 11, 2017 12:19 PM
To: Vannoy, Elizabeth ("Betty") <(b) (6)>
Subject: RE: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)

Betty,

Please see the attached presentation for my upcoming speaking engagement.

Best Regards,

Rollin

From: Vannoy, Elizabeth ("Betty")
Sent: Tuesday, July 11, 2017 9:31 AM
To: Badal, Rollin <(b) (6)>
Cc: Stevenson, Braddock <(b) (6)>
Subject: RE: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)

Thanks, Rollin!

From: Badal, Rollin

Sent: Tuesday, July 11, 2017 9:30 AM

To: Vannoy, Elizabeth ("Betty") (b) (6) >

Cc: Stevenson, Braddock (b) (6) >

Subject: RE: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)

Hi Betty,

I plan on speaking at the event. I will submit my presentation today for clearance.

Regards,

Rollin

From: Vannoy, Elizabeth ("Betty")

Sent: Tuesday, July 11, 2017 9:09 AM

To: Badal, Rollin <(b) (6)>

Cc: Stevenson, Braddock <(b) (6)>

Subject: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)

Hi Rollin – I'm just checking to be sure you are still interested in attending and speaking at the above-referenced event since we haven't heard from you. If yes, then we will need your TPs cleared through counsel and Treasury's front office. We can rush them through counsel and get them to Treasury shortly thereafter. Let me know. Thanks so much.

From: Vannoy, Elizabeth ("Betty")

Sent: Thursday, July 06, 2017 7:03 AM

To: Badal, Rollin <(b) (6)>

Cc: James, Sheri <(b) (6)>

Subject: Talking Points/Presentation

Hi Rollin – Just a reminder that we will need to get your TPs for the Symposium in California on *"Building a Culture of Compliance"* cleared by counsel. Once counsel clears, I will then send them to Treasury (hopefully, no later than July 11).

Thanks!

--Betty

From: Vannoy, Elizabeth (Betty)
To: Hudak, Stephen
Cc: Basso, Candice
Bcc:
Subject: **FW: CLEARANCE REQUEST: Sept. 20, 2017--USSOCOM Counter Threat Financing Working Group**
Attachments: [Tampa Talking Points Consolidated JH.docx](#)

Hi Steve,

Tom Lawler and Matt Stubbs will be participating in the referenced event. Their TPs have been approved by counsel. It's closed press, but some private sector folks will be there. Any issues?

From: Vannoy, Elizabeth (Betty)
To: Hudak, Stephen
Cc: Basso, Candice
Bcc:
Subject: **CLEARANCE REQUEST: August 15-17 Casino Essentials Conference (Las Vegas)**
Attachments: [Casino Conference.TPs.OTT_08152017.docx](#) [Independent Testing Panel Talking Points.docx](#) [Individual Liability Talking Points.docx](#) [Examination HotTopics 08.15.2017.pptx](#)

August 08, 2017 9:51:24 AM (-04)

Hi Steve,

Tom Ott and Kevin O 'Connor are both participating in the Casino Essentials 9th Annual AML Conference taking place next week. It is open press, so I 'm attaching their talking points for your clearance. Tom is giving a keynote on the first day of the conference and Kevin is participating on three panels. Thanks. -- Betty

Thanks.

--Betty

From: Vannoy, Elizabeth (Betty)
To: Hudak, Stephen
Cc: Basso, Candice
Bcc:
Subject: **FW: Talking points- American Gaming Conference Events**
Attachments: [Talking points- Anti-Human Trafficking Summit FINAL \(002\).docx](#) [Talking points- Anti-Human Trafficking Summit FINAL-accept edits of coun....docx](#)

September 20, 2017 11:27:07 AM (-04)

Hi Steve – Veronica Agpaoa is presenting at two events taking place in conjunction with the G2E conference in Las Vegas. Talking points for each are attached for your review / clearance.

Thanks!

--Betty

From: Vannoy, Elizabeth (Betty)
To: Hudak, Stephen
Cc: Basso, Candice
Bcc:
Subject: **FW: CLEARANCE REQUEST: George Mason University Conf. on ML through Real Estate (Arlington, VA)**
Attachments: [Geographic Targeting Orders TPs for GMU 2.27.2018 CLEAN.DOCX](#)

March 05, 2018 2:50:55 PM (-05)

And one more – Kevin Bell will use the attached talking points for a presentation that he will give at the George Mason University Conference on Money Laundering through Real Estate taking place at GMU's Arlington Campus on March 23. Counsel has cleared. Any issues from a PA standpoint?

Thanks!

--Betty

Geographic Targeting Orders
March 2018 GMU Conference on Real Estate Money Laundering:
Key Points to Make and Q&A

Topline Message

The Director of FinCEN may issue a geographic targeting order (GTO) to impose certain additional recordkeeping and reporting requirements on one or more domestic financial institutions or nonfinancial trades or businesses in a geographic area upon a finding that reasonable grounds exist to conclude that such additional reporting and recordkeeping are necessary to carry out the purpose of the BSA or to prevent evasions thereof. GTOs are temporary and can be used to collect information on the identity of the party to a transaction, the beneficial ownership of a legal entity, or other information relevant for an investigation. FinCEN has historically used this tool in partnership with law enforcement to solicit more information on potentially illicit transactions involving armored cars, trade-based money laundering, and most recently real estate.

In January 2016, FinCEN issued GTOs requiring covered title insurance companies to report the beneficial ownership information of legal entities purchasing luxury residential property in Manhattan and Miami-Dade County in certain all-cash transactions (i.e., without a mortgage). In July 2016, and again in February 2017, FinCEN reissued these GTOs, expanding coverage to all U.S. title insurance companies, transactions involving a business or personal check, and four additional major metropolitan areas. In August 2017, Congress provided FinCEN the authority to use GTOs to collect information on transactions involving a wire transfer, and later that month, FinCEN reissued the Real Estate GTOs and expanded their coverage to include Honolulu and transactions involving wire transfers.

FinCEN has analyzed the data received from title insurance companies, and is confident that the GTOs confirm that there is an important money laundering vulnerability in the all-cash luxury real estate sector that can be exploited by using legal entities to hide the beneficial ownership of a property. Over 30% of the hundreds of transactions covered by the GTO had a beneficial owner or purchaser representative who was the subject of a Suspicious Activity Report filed by a financial institution. In other words, over 30% of the covered transactions directly involved a party who was independently the subject of a report from a financial institution indicating that the individual may have been involved in illicit financial activity. FinCEN is concerned about this vulnerability and is working with industry, law enforcement, and others to learn more about what other steps may be appropriate to address money laundering in the all-cash real estate sector.

Talking Points

- GTOs are used to increase the financial transparency of certain sectors and geographic areas where FinCEN and law enforcement are concerned about potential illicit activity. This flexible tool increases the transparency of otherwise opaque transactions, informs Treasury efforts to mitigate potential money laundering vulnerabilities, and produces valuable reporting to assist law enforcement efforts. GTOs have been used to combat trade-based

money laundering, deter credit card fraud, and bring transparency to the high-end real estate sector.

- FinCEN has had longstanding concerns that “all-cash” real estate transactions (i.e., those without bank financing), which largely fall outside the scope of existing anti-money laundering requirements, may present money laundering vulnerabilities, particularly where a purchaser uses a shell company to conceal the true buyer. To better understand this vulnerability, FinCEN issued GTOs in January 2016 requiring U.S. title insurance companies to report certain transactions in which a legal entity (e.g., a limited liability company or a corporation) pays “all-cash” for luxury residential real estate. The required information includes the beneficial owners of the legal entities involved in the purchase. The original GTOs issued in January 2016 covered transactions in Manhattan and Miami. In July 2016, FinCEN reissued the orders and expanded coverage to include all of New York City, additional counties in South Florida, Los Angeles, San Francisco, San Diego, and San Antonio in order to capture more transactions than were originally covered in the January 2016 orders. The original orders were limited to transactions involving cashiers’ checks; the expanded orders covered transactions involving personal and business checks. These July 2016 expanded GTOs were reissued in February 2017. In August 2017, FinCEN again reissued the GTOs and expanded coverage to include Honolulu, and transactions taking place through a wire transfer. The real estate GTOs are providing FinCEN and law enforcement valuable transactional information about potential money laundering involving all-cash high-value residential real estate.
- Thanks to the passage of CAATSA in 2017, FinCEN can now use GTOs to collect information on transactions involving wire transfers. Previously, GTOs were limited to collection on transactions involving currency or monetary instruments (e.g., cashier’s checks, or money orders). FinCEN has used this new authority to collect information on transactions involving wire transfers in the latest real estate GTO.
- FinCEN is currently working with law enforcement officials, industry representatives and others to gather information that will be useful in determining what next steps may be appropriate to address the money laundering vulnerabilities in this sector.

Potential Q&A’s

- **Why were the Real Estate GTOs issued?**

Treasury has had longstanding concerns that “all-cash” purchases of real estate by legal entities present a particular money laundering vulnerability because it is difficult to identify the true owner of such properties and none of the parties commonly involved in such transactions have any obligation to report suspicious activity to FinCEN. FinCEN is using the data generated from the GTOs issued in New York, Florida, California, Texas, and Hawaii to better understand the scope and scale of money laundering through real estate. The information gathered from the GTOs will help inform Treasury’s broader approach to mitigating the money laundering vulnerabilities in the real estate sector.

- **Will FinCEN reissue the GTOs indefinitely?**

Generally, FinCEN does not comment on the possibility of reissuing GTOs. Historically, GTOs have been used as a temporary information collection tool, and FinCEN is using the Real Estate GTOs to further its goal of better understanding the money laundering risks in the real estate sector.

- **How has the GTO data been useful?**

What we have found so far is that the GTOs helped link previously unconnected suspicious activity to the true purchasers of luxury property in targeted locations. This corroborates our concerns that the transactions covered by the GTO (i.e., all-cash luxury purchases of residential property by a legal entity) are highly vulnerable to abuse for money laundering.

On November 15, Alex Zerden will participate on a panel entitled *Public Private Partnerships: How the National Security Community Interacts with the Private Sector* at an event sponsored by the American University Washington College of Law. The attached Talking Points have been reviewed by counsel (with a couple of comments that Alex will address when he returns from out of the country). A brief summary of the event pulled from the DO spreadsheet is below. Let me know if PA has any issues. Thanks!

Date	Name	Event	City	State	Summary	Host	Audience	Press
11/15/2017	Zerden, Alex	National Security Law Symposium on Public-Private Partnerships	Washington	DC	Alex will participate on a panel along with representatives from the Hill, the Intelligence Community, and the private sector to discuss how Public Private Partnerships function at the crossroads of national security and financial services.	American University Washington College of Law	60	Open

From: James, Sheri March 07, 2018 9:57:37 AM (-05)
To: Cox, Alan; Hudak, Stephen
Cc:
Bcc:
Subject: **Review needed: FIBA questions 3_6_18 with edits**

Attachments: [FIBA questions 3_6_18 with edits.docx](#)

Hello! I just wanted to send these talking points to you both separately and as a special appeal for your review. Can you take a quick look at the questions and proposed talking points and let me know if you have anything to add? I am being told to get these into Ken's book this afternoon. Thank you so much!!

From: James, Sheri March 06, 2018 3:00:10 PM (-05)
To: Chen, Edgar; El-Hindi, Jamal [SES]; Hudak, Stephen; Bressack, Leah (Detailee)
Cc: Vannoy, Elizabeth (Betty)
Bcc:
Subject: **Urgent - review of speaking event on real estate George**

Attachments: [Date TBD -- George Mason Univ. Real Estate AML Conference Summary.docx](#) [Geographic Targeting Orders TPs for GMU 2.27.2018 CLEAN.DOCX](#)

All – wanted to circle back with this group to flag an upcoming speaking event on the real estate GTO that Kevin Bell was cleared to do at George Mason University. It is on March 23. It is open press. b(5)
b(5)

The first document is a summary of the event and the clearance process and the second document is Kevin's talking points.

Please advise.

Thanks,

Sheri

From: O'Connor, Kevin February 27, 2018 10:15:58 AM (-05)
To: James, Sheri; Sharrin, Andrea [SES]; Ott, Timothy [SES]; Ott, Thomas [SES]; Kuester, Jeremy; Harris, Anthony; Cox, Alan; Hudak, Stephen; Kiefel, Erik; O'Brien, Patrick; Sausser, Jeremy
Cc: El-Hindi, Jamal [SES]; Chen, Edgar; Bressack, Leah (Detailee)
Bcc:
Subject: RE: Prep for Director Blanco's FIBA event
Attachments: [Virtual Currency TPs 11.08.17.docx](#)

Thanks, Sheri! The attached are the points we pulled together for Sigal last November – they were cleared. I'm sharing to the wider group in case they add value to anyone else's VC-related engagements.

I believe there's probably too much there for this engagement, but we can definitely pick and choose the appropriate points. Let me know if you need more, different points, or assistance trimming.

-Kevin

From: James, Sheri
Sent: Tuesday, February 27, 2018 9:15 AM
To: Sharrin, Andrea [SES] <(b) (6)>; Ott, Timothy [SES] <(b) (6)>; Ott, Thomas [SES] <(b) (6)>; Kuester, Jeremy <(b) (6)>; Harris, Anthony <(b) (6)>; Cox, Alan <(b) (6)>; Hudak, Stephen <(b) (6)>; O'Connor, Kevin <(b) (6)>; Kiefel, Erik <(b) (6)>; O'Brien, Patrick <(b) (6)>; Sausser, Jeremy <(b) (6)>
Cc: El-Hindi, Jamal [SES] <(b) (6)>; Chen, Edgar <(b) (6)>; Bressack, Leah (Detailee) <(b) (6)>
Subject: Prep for Director Blanco's FIBA event
Importance: High

Good morning everyone –(b) (5)

[Redacted]

(b) (5)

[Redacted]

(b) (5)



Sheri

From: Badal, Rollin February 26, 2018 2:43:37 PM (-05)
To: James, Sheri; El-Hindi, Jamal [SES]; Sharrin, Andrea [SES]; Ott, Thomas [SES]; Banks, Preston; Blount, Conici; Harris, Anthony; Maesen, Betsy; Cox, Alan; Hudak, Stephen; Enis, Mark
Cc: Chen, Edgar
Bcc:
Subject: RE: Expedited Review needed: AGA Summit (draft remarks)
Attachments: [AGA Outline 2 23 18 ED - LD edits.docx](#)

With attachment.

From: Badal, Rollin
Sent: Monday, February 26, 2018 2:32 PM
To: James, Sheri <(b) (6)>; El-Hindi, Jamal [SES] <(b) (6)>; Sharrin, Andrea [SES] <(b) (6)>; Ott, Thomas [SES] <(b) (6)>; Banks, Preston <(b) (6)>; Blount, Conici <(b) (6)>; Harris, Anthony <(b) (6)>; Maesen, Betsy <(b) (6)>; Cox, Alan <(b) (6)>; Hudak, Stephen <(b) (6)>; Enis, Mark <(b) (6)>
Cc: Chen, Edgar <(b) (6)>
Subject: RE: Expedited Review needed: AGA Summit (draft remarks)

Hi Sheri,

I have incorporated edits provided by LD on state MOUs and talking points for AJC. Please let me know if you have any questions. I have also included on additional talking point for your consideration below (with the help of Kevin):

Casinos should be applying appropriate due diligence to transactions with foreign-marketing offices. Particularly as they pertain to high-roller international customers and junkets. FinCEN's action against Caesar's Palace helps highlight elements of this – as they failed to conduct appropriate due diligence on their branch offices catering to this clientele. In that case, also, marketing executives failed to share information with the casino's BSA compliance department.

Regards,

Rollin

From: James, Sheri
Sent: Monday, February 26, 2018 10:57 AM
To: El-Hindi, Jamal [SES] b(6); Sharrin, Andrea [SES]
b(6); Ott, Thomas [SES] b(6); Badal, Rollin
anks, Preston b(6) Blount, Conici
Harris, Anthony b(6); Maesen, Betsy
; Cox, Alan b(6) Hudak, Stephen
Cc: Chen, Edgar b(6)
Subject: Expedited Review needed: AGA Summit (draft remarks)
Importance: High

Good morning everyone – Thank you for participating in our brainstorming session last Friday in preparation for Director Blanco’s speech at the AGA Summit on March 6. Based on those discussions, I have pulled together to attached (very rough) draft of remarks for the Director. b(5)
b(5)

Ideally, I would love to get your input in the next few hours, which would allow me to get a version into the Director’s read book before he leaves for New York this afternoon. I realize this might not be possible, but if you have input you can provide by 2:00 p.m. today I would be most grateful. Again, even if it is just rough language for Director Blanco to be able to react to.

Thanks so much for your assistance!

Best,

Sheri

From: Gerardi, Robert
To: Hudak, Stephen
Cc:
Bcc:
Subject: RE: Would appreciate the view of you, a not completely disinterested observer
Attachments:

February 22, 2018 10:44:24 AM (-05)

Thanks. Agreed. I might as well include Julie M at the start. Best, BG

From: Hudak, Stephen
Sent: Thursday, February 22, 2018 10:42 AM
To: Gerardi, Robert <(b) (6)>
Subject: RE: Would appreciate the view of you, a not completely disinterested observer

Looks good! I wouldn't hesitate on this one. He'll probably come back with questions and loop and add, loop and add,

From: Gerardi, Robert
Sent: Thursday, February 22, 2018 10:19 AM
To: Hudak, Stephen <(b) (6)>
Subject: Would appreciate the view of you, a not completely disinterested observer

(b) (5)

Morning Lawrence,

(b) (5)

(b) (5)



Please feel free to contact me or our office if you have any questions or comments.

Best

Bob

From: Edvard Pettersson (BLOOMBERG/ LOS ANGEL) February 08, 2018 2:06:28 PM (-05)
To: Hudak, Stephen
Cc:
Bcc:
Subject: [EXTERNAL] RE: Bloomberg News inquiry
Attachments:

Thanks, Stephen. Can you or anyone else at FinCEN talk about how the information you receive is being used and about the importance of collecting this information?

From: (b) (6) At: 02/08/18 11:02:03
To: [Edvard Pettersson \(BLOOMBERG/ LOS ANGEL \)](#)
Subject: RE: Bloomberg News inquiry

Hi Edvard,

We don't have new information to share about our GTOs at this point. We analyzing the information that we have received and will hopefully have more to report in the next several weeks. Here are links to information about the GTOs origination and subsequent renewals:

<https://www.fincen.gov/news/news-releases/fincen-takes-aim-real-estate-secrecy-manchattan-and-miami>

<https://www.fincen.gov/news/news-releases/fincen-expands-reach-real-estate-geographic-targeting-orders-beyond-manchattan>

<https://www.fincen.gov/news/news-releases/fincen-renews-real-estate-geographic-targeting-orders-identify-high-end-cash>

<https://www.fincen.gov/news/news-releases/fincen-targets-shell-companies-purchasing-luxury-properties-seven-major>

The current GTO in in effect until March 20th:

<https://www.fincen.gov/sites/default/files/shared/Real%20Estate%20GTO%20Order%20-%20208.22.17%20Final%20for%20execution%20-%20Generic.pdf>

From: b(6)
Sent: Thursday, February 08, 2018 1:32 PM
To: epettersson@bloomberg.net
Cc: Hudak, Stephen <b(6)>
Subject: [TREASURY] RE: Bloomberg News inquiry

Hey Edvard,

While I'm not sure how much we'll be able to say publicly about asset forfeitures, I'm CC'ing Steve Hudak at FinCEN who handles public affairs on these issues.

Thanks,

Seth

From: Edvard Pettersson (BLOOMBERG/ LOS ANGEL) [<mailto:epettersson@bloomberg.net>]
Sent: Thursday, February 08, 2018 1:10 PM
To: Unger, Seth b(6)
Subject: Bloomberg News inquiry

Hi Seth, I'm a reporter with Bloomberg News and I would like to speak with someone from the Treasury Dept. regarding FinCEN's efforts to monitor shell companies that are used to by luxury real estate in some U.S. markets.

Specifically, I'm interested in to what extent these efforts have been successful in detecting money laundering and have led to prosecutions and/or asset forfeitures.

Many thanks,

Edvard

Edvard Pettersson
Reporter
Bloomberg News
310-201 b(6) (desk)
b(6) (mobile)

From: Hudak, Stephen March 05, 2018 2:52:54 PM (-05)
To: Vannoy, Elizabeth (Betty)
Cc: Basso, Candice
Bcc:
Subject: RE: CLEARANCE REQUEST: George Mason University Conf. on ML through Real Estate (Arlington, VA)
Attachments:

Nope, all been said before ... thanks!

From: Vannoy, Elizabeth ("Betty ")
Sent: Monday, March 05, 2018 2:51 PM
To: Hudak, Stephen <(b) (6)>
Cc: Basso, Candice <(b) (6)>
Subject: FW: CLEARANCE REQUEST: George Mason University Conf. on ML through Real Estate (Arlington, VA)

(b) (5)

Thanks!

--Betty

From: Hudak, Stephen
To: (b) (6)
Cc:
Bcc:
Subject: FW: FAQ update
Attachments: [Real Estate GTOs Phase 4 TPs for Reissuing 8.17.2017.docx](#) [FAQs on Phase 4 Real Estate GTO 8.17.2017.docx](#)

From: (b) (6)
Sent: Thursday, August 17, 2017 2:53 PM
To: (b) (6) >; Kirschenbaum, Joshua <(b) (6)>; Ott, Thomas <(b) (6)>; Hudak, Stephen <(b) (6)>
Cc: Sharrin, Andrea <(b) (6)>
Subject: FAQ update

Folks,

(b) (5)

Thanks,

(b) (6)

Research and Enforcement Specialist
Office of Special Measures
Financial Crimes Enforcement Network
Desk: (b) (6)
Mobile: (b) (6)

From: Hudak, Stephen
To: Porter, Kelly; Hanson, Mark
Cc:
Bcc:
Subject: RE: Rep Pittenger FW: forum report
Attachments:

August 07, 2017 4:47:32 PM (-04)

No issues on my end, I defer to Kelly. Thanks for the look!

From: Porter, Kelly
Sent: Monday, August 07, 2017 4:47 PM
To: Hanson, Mark <(b) (6)>; Hudak, Stephen <(b) (6)>
Subject: RE: Rep Pittenger FW: forum report

Sure, I'll check with MT LA just to make sure they have no issues.

From: Hanson, Mark
Sent: Monday, August 07, 2017 4:44 PM
To: Porter, Kelly <(b) (6)>; Hudak, Stephen <(b) (6)>
Subject: Rep Pittenger FW: forum report

Hi Kelly, Steve,

(b) (6), (b) (5)

Thanks,

-Mark

Mark Hanson

(b) (6)

From: Fonda, Clark <(b) (6)>
Sent: Monday, August 07, 2017 9:26 AM
To: Hanson, Mark <(b) (6)>
Subject: forum report

Hi Mark, I just wanted to follow up on the statement we discussed for our forum report.

Do you think it would be possible to finalize that this week? Mr. Pittenger is asking me to begin distributing our report as soon

as possible.

Please let me know if you think something could be put together for this week. Thanks so much. We certainly appreciate it.

Clark Fonda

Deputy Chief of Staff

Rep. Robert Pittenger (NC-09)

224 Cannon House Office Building

b(6)

From: Hudak, Stephen August 08, 2017 10:05:00 AM (-04)
To: Vannoy, Elizabeth (Betty)
Cc: Basso, Candice
Bcc:
Subject: RE: CLEARANCE REQUEST: August 15-17 Casino Essentials Conference (Las Vegas)
Attachments:

Looks great. No issues here. Thanks, Betty!

From: Vannoy, Elizabeth ("Betty")
Sent: Tuesday, August 08, 2017 9:51 AM
To: Hudak, Stephen <(b) (6)>
Cc: Basso, Candice <(b) (6)>
Subject: CLEARANCE REQUEST: August 15-17 Casino Essentials Conference (Las Vegas)

Hi Steve,

Tom Ott and Kevin O'Connor are both participating in the Casino Essentials 9th Annual AML Conference taking place next week. It is open press, so I'm attaching their talking points for your clearance. Tom is giving a keynote on the first day of the conference and Kevin is participating on three panels. Thanks. --Betty

Thanks.

--Betty

From: Hudak, Stephen
To: Vannoy, Elizabeth (Betty)
Cc:
Bcc:
Subject: RE: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)
Attachments:

July 13, 2017 10:52:00 AM (-04)

Looks great...clear

From: Vannoy, Elizabeth ("Betty")
Sent: Thursday, July 13, 2017 10:50 AM
To: Hudak, Stephen <(b) (6)>
Cc: Basso, Candice <(b) (6)>
Subject: FW: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)

Hi Steve – The attached TPs are with our counsel for review. I hoping to get them back today so I can send them to Treasury, but need your okay as well. Thanks!

From: Badal, Rollin
Sent: Tuesday, July 11, 2017 12:19 PM
To: Vannoy, Elizabeth ("Betty") <(b) (6)>
Subject: RE: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)

Betty,

Please see the attached presentation for my upcoming speaking engagement.

Best Regards,

Rollin

From: Vannoy, Elizabeth ("Betty")
Sent: Tuesday, July 11, 2017 9:31 AM
To: Badal, Rollin <(b) (6)>
Cc: Stevenson, Braddock <(b) (6)>
Subject: RE: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)

Thanks, Rollin!

From: Badal, Rollin
Sent: Tuesday, July 11, 2017 9:30 AM
To: Vannoy, Elizabeth ("Betty") <(b) (6)>
Cc: Stevenson, Braddock <(b) (6)>

Subject: RE: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)

Hi Betty,

I plan on speaking at the event. I will submit my presentation today for clearance.

Regards,

Rollin

From: Vannoy, Elizabeth ("Betty")

Sent: Tuesday, July 11, 2017 9:09 AM

To: Badal, Rollin <(b) (6)>

Cc: Stevenson, Braddock <(b) (6)>

Subject: July 18 and 19 -- California Department of Justice-Bureau of Gambling Symposium (San Bernardino and Los Angeles)

Hi Rollin – I'm just checking to be sure you are still interested in attending and speaking at the above-referenced event since we haven't heard from you. If yes, then we will need your TPs cleared through counsel and Treasury's front office. We can rush them through counsel and get them to Treasury shortly thereafter. Let me know. Thanks so much.

From: Vannoy, Elizabeth ("Betty")

Sent: Thursday, July 06, 2017 7:03 AM

To: Badal, Rollin <(b) (6)>

Cc: James, Sheri <(b) (6)>

Subject: Talking Points/Presentation

Hi Rollin – Just a reminder that we will need to get your TPs for the Symposium in California on *"Building a Culture of Compliance"* cleared by counsel. Once counsel clears, I will then send them to Treasury (hopefully, no later than July 11).

Thanks!

--Betty

From: Hudak, Stephen
To: James, Sheri
Cc: Vannoy, Elizabeth (Betty)
Bcc:
Subject: RE: Talking Points for Parliamentary Security Forum

June 06, 2017 10:16:00 AM (-04)

Attachments:

I clear. Looks good to me.

From: James, Sheri
Sent: Tuesday, June 06, 2017 10:09 AM
To: Hudak, Stephen <(b) (6)>
Cc: Vannoy, Elizabeth ("Betty") <(b) (6)>
Subject: FW: Talking Points for Parliamentary Security Forum

Steve – Can you please give this your review as the event is open to the press? It has cleared FinCEN Counsel. Thanks!

From: Orlin, Lindsay
Sent: Tuesday, June 06, 2017 10:04 AM
To: Vannoy, Elizabeth ("Betty") <(b) (6)>
Cc: James, Sheri <(b) (6)>
Subject: FW: Talking Points for Parliamentary Security Forum

fyi

From: Hattan, Justin
Sent: Tuesday, June 06, 2017 9:47 AM
To: Orlin, Lindsay <(b) (6)>
Subject: FW: Talking Points for Parliamentary Security Forum

Lindsay,

This sounds like an interesting talk. I don't have any legal comments/edits.

Thanks,
Justin

From: Orlin, Lindsay
Sent: Tuesday, June 06, 2017 8:37 AM
To: Hattan, Justin <(b) (6)>
Subject: FW: Talking Points for Parliamentary Security Forum

(b) (5)

(b) (5)

Thanks

Lindsay.

From: Hanson, Mark

Sent: Monday, June 05, 2017 10:28 PM

To: Orlin, Lindsay <(b) (6)>

Cc: Vannoy, Elizabeth ("Betty") <(b) (6)>; Vondra, Eric <(b) (6)>

Subject: Talking Points for Parliamentary Security Forum

Hi Lindsay,

(b) (5)

Thanks,

(b) (6)

Cyber and Emerging Technologies

FinCEN Intelligence Division

(b) (6)

From: Hudak, Stephen May 24, 2017 3:52:59 PM (-04)
To: James, Sheri; Gunderson, Jeannette
Cc: Vannoy, Elizabeth (Betty)
Bcc:
Subject: **RE: Review/Clearance needed: Forty-fourth Cash-in-Transit Networking Conference sponsored by the Independent Armored Car Operators Association**

Attachments:

OK with Seth, if it's OK with Exec. Sec.

From: James, Sheri
Sent: Wednesday, May 24, 2017 2:56 PM
To: Gunderson, Jeannette (b) (6) >; Hudak, Stephen <(b) (6) >
Cc: Vannoy, Elizabeth ("Betty") <(b) (6) >
Subject: Review/Clearance needed: Forty-fourth Cash-in-Transit Networking Conference sponsored by the Independent Armored Car Operators Association
Importance: High

(b) (6), (b) (5)

Thanks!

(b) (5)

From: Hudak, Stephen March 03, 2017 2:33:11 PM (-05)
To: James, Sheri; Sharrin, Andrea; Kirby, Jimmy
Cc:
Bcc:
Subject: RE: TPs
Attachments:

(b) (5)



From: James, Sheri
Sent: Friday, March 03, 2017 2:22 PM
To: Sharrin, Andrea <(b) (6)>; Hudak, Stephen <(b) (6)>
Subject: RE: TPs

I do not... Steve, do you have any guidance from Treasury public affairs that might help?

From: Sharrin, Andrea
Sent: Friday, March 03, 2017 2:21 PM
To: James, Sheri <(b) (6)>; Hudak, Stephen <(b) (6)>
Subject: TPs

Do we have any talking points on the impact of the EOs (reg reform, earlier freeze), I know I'll be asked about it at FIBA

Andrea Sharrin
Associate Director, Policy Division
Financial Crimes Enforcement Network
U.S. Department of Treasury
(b) (6) | (b) (6)

From: Hudak, Stephen February 21, 2017 9:52:00 AM (-05)
To: Rucker, Gayle; Levine, Laurence; Saldana, Jose
Cc: Ayers, Patrick; Sohn, Gregory
Bcc:
Subject: RE: ED Talking Points 2-21-17 Draft
Attachments:

Looks good, thank you.

From: Rucker, Gayle
Sent: Tuesday, February 21, 2017 9:49 AM
To: Hudak, Stephen <(b) (6)>; Levine, Laurence <(b) (6)>; Saldana, Jose <(b) (6)>
Cc: Ayers, Patrick <(b) (6)>; Sohn, Gregory <(b) (6)>
Subject: ED Talking Points 2-21-17 Draft
Importance: High

All,
Attaches is the latest document to which (b)(5)

Your PROMPT feedback is requested.

THANKS,

Gayle Rucker

(b)(6)

From:

Hudak, Stephen

To:

O'Connor, Kevin

Cc:

Bcc:

Subject:

First draft

Attachments:

[BTC-e July 19 Draft.docx](#)

July 19, 2017 3:21:37 PM (-04)

(b) (5)

From: Hudak, Stephen
To: Sharrin, Andrea
Cc:
Bcc:
Subject: RE: gto TPs and stats

February 06, 2017 2:14:46 PM (-05)

Attachments: [Talking Points for GTO Expiration Feb 2017.docx](#)

I'll find and forward (forthwith) Lawrence's latest data chart...

From: Sharrin, Andrea
Sent: Monday, February 06, 2017 1:16 PM
To: Hudak, Stephen <(b) (6)>
Subject: gto TPs and stats

Hi Steve,

Could you send me the final GTO TPs and stats?

Andrea Sharrin
Associate Director, Policy Division
Financial Crimes Enforcement Network
U.S. Department of Treasury
(b) (6)

From: Hudak, Stephen
To: Richardson, Laura
Cc:
Bcc:
Subject: RE: Talking Points For SIFMA

February 01, 2017 4:38:47 PM (-05)

Attachments:

YES! Things are a little fuzzy with the Main building right now, so no rush. But, I'm happy to pursue this stuff!

From: (b) (6)
Sent: Wednesday, February 01, 2017 4:31 PM
To: Hudak, Stephen <(b) (6)>
Subject: FW: Talking Points For SIFMA

The first two attachments seem to be reports that we could have disseminated to industry or the public in a grander way than emailing a handful of people at SEC, CFTC, FINRA and Fed. What do you think?

(b) (6)
Department of Treasury, FinCEN
Intelligence Division
(b) (6) – Trade, Investment, and Fraud
(b) (6)
(b) (6) office
(b) (6) mobile

From: Richardson, Laura
Sent: Wednesday, February 01, 2017 4:29 PM
To: Sharrin, Andrea <(b) (6)>
Cc: Vondra, Eric <(b) (6)>; de Luca, Michael <(b) (6)>
Subject: Talking Points For SIFMA

(b) (5)



(b) (5)

(b) (6)
Department of Treasury, FinCEN
Intelligence Division
(b) (6) – Trade, Investment, and Fraud
(b) (6)
(b) (6) office
(b) (6) mobile

From: Sharrin, Andrea
Sent: Friday, January 27, 2017 5:36 PM
To: (b) (6) >; (b) (6)
Cc: Vondra, Eric <(b) (6)>; Patel, Kristen <(b) (6)>
Subject: RE: Securities help

You guys are the best – I really appreciate the help!

From: (b) (6)
Sent: Friday, January 27, 2017 4:44 PM
To: (b) (6) Sharrin, Andrea <(b) (6)>
Cc: (b) (6) Patel, Kristen b(6)
Subject: FW: Securities help

Hi (b) (6)

(b) (5)

(b) (5)

Regards,
(b) (6)
(b) (6)
Department of Treasury, FinCEN
Intelligence Division
(b) (6) – Trade, Investment, and Fraud
(b) (6)
(b) (6) office

(b) (6) mobile

From: Sharrin, Andrea
Sent: Friday, January 27, 2017 4:15 PM
To: (b) (6)
Cc: Patel, Kristen <(b) (6)>
Subject: Securities help

Hi (b) (6)–

(b) (5)

Best,

Andrea

Andrea Sharrin
Associate Director, Policy Division
Financial Crimes Enforcement Network
U.S. Department of Treasury
(b) (6) (office) | (b) (6) (mobile)

(b) (6)
Department of Treasury, FinCEN
Intelligence Division
(b) (6) – Trade, Investment, and Fraud
(b) (6)
(b) (6) office
(b) (6) mobile

From: Hudak, Stephen
To: Rosero, Diego; Madinaveitia, Horacio; Evans, Sean; Bleckley, Kevin
Cc: Sharrin, Andrea; Kuester, Jeremy
Bcc:
Subject: **Talking Points for Newsweek background interview tomorrow on virtual currency**
Attachments: [Virtual Currency Interview Newsweek Dec 1.docx](#)

November 30, 2016 3:24:08 PM (-05)

Andrea will join Sarah Runge tomorrow (2:30PM) for a background interview phone call with Newsweek reporter, Leah McGrath Goodman. Leah is working on a story on virtual currency and has provided the following topic: "I am working on a story for Newsweek about fintech's implications for national security, specifically looking at how targeting and tracking decentralized, virtual currencies is quite different from achieving the same via dollarized payments."

(b) (5)



